

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

|                             |   |                          |
|-----------------------------|---|--------------------------|
| DAVITA M. KEY,              | ) |                          |
|                             | ) |                          |
| Plaintiff,                  | ) |                          |
|                             | ) |                          |
| v.                          | ) | Case No. 2:19-CV-767-ECM |
|                             | ) |                          |
| HYUNDAI MOTOR               | ) |                          |
| MANUFACTURING, ALABAMA,     | ) |                          |
| LLC; HYUNDAI ENG AMERICA,   | ) |                          |
| INC.; and DYNAMIC SECURITY, | ) |                          |
| INC.                        | ) |                          |
|                             | ) |                          |
| Defendants.                 | ) |                          |

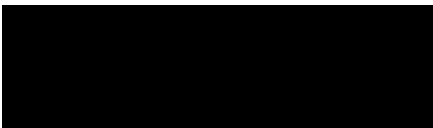
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**PLAINTIFF'S WITNESS LIST**

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COMES NOW the Plaintiff and identifies the following witnesses for the trial  
of the above styled matter.

A. The Plaintiff Will Call the Following Witnesses at Trial:

1. Davita Key  
Contact c/o Counsel  

2. Cassandra Williams  
Contact c/o HEA Counsel

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

3. Ray Cureton

[REDACTED]  
[REDACTED]

4. Dynamic Security's 30(b)(6) Deponent(s)  
Contact c/o Dynamic Security Counsel

5. Hyundai Motor Manufacturing's 30(b)(6) Deponent  
Contact c/o HMMA Counsel

6. Hyundai Eng America's 30(b)(6) deponent  
Contact c/o HEA Counsel

B. The Plaintiff May Call the Following Witnesses at Trial:

1. Latunya Howell

[REDACTED]  
[REDACTED]

2. Maurice Chambliss

[REDACTED]  
[REDACTED]

3. Gloria Robinson

[REDACTED]  
[REDACTED]

4. Nicole Scavella

[REDACTED]  
[REDACTED]

5. Robert Burns

Contact c/o HMMA Counsel

6. Sherry Spires  
Contact c/o Dynamic Security Counsel
7. Kristal Riddle  
Contact c/o Dynamic Security Counsel
8. Tracy Peoples  
Contact c/o Dynamic Security Counsel
9. Chris Hargrove  
Contact c/o Yvonne Maddalena  
Jackson Lewis P.C.
10. Custodian of Records from the Alabama Department of Labor in  
  
the event the parties cannot reach a stipulation as to the  
  
authenticity of the documents the Alabama Department of Labor  
  
produced in response to Defendant HMMA's subpoena
11. Custodian of Records from the EEOC in the event the parties  
  
cannot reach a stipulation as to the authenticity of the documents  
  
produced by the EEOC in response to Defendant HMMA's  
  
Freedom of Information Act Request.
12. Any witness(es) necessary for rebuttal and/or impeachment

C. Plaintiff Will Present the Following Witnesses Via Deposition:

1. Dynamic Security's 30(b)(6) Deponent (Kristal Riddle)<sup>1</sup>

009:17 - 009:19  
009:23 - 010:03  
010:07 - 010:09  
013:09 - 015:03  
015:07 - 017:08  
017:18 - 018:17  
018:22 - 020:13  
021:02 - 021:17  
022:05 - 022:14  
050:03 - 051:07  
051:13 - 052:01  
052:11 - 053:14  
053:20 - 053:23  
054:05 - 054:10  
055:18 - 056:01  
056:03 - 057:21  
058:18 - 059:05  
060:04 - 060:09  
062:16 - 063:18  
064:02 - 064:09  
066:08 - 066:18  
067:10 - 067:13  
071:16 - 072:19  
072:22 - 072:23  
073:05 - 073:22  
074:01 - 075:05  
089:15 - 089:19  
094:14 - 094:15  
094:17 - 095:22  
096:08 - 096:09

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<sup>1</sup> A copy of the proposed deposition excerpts is attached as Exhibit A

096:13 - 096:19  
097:02 - 097:04  
097:07 - 099:01  
099:13 - 100:03  
110:07 - 110:13  
115:14 - 116:03  
117:01 - 117:10  
119:23 - 120:01  
120:05 - 120:13  
121:01 - 121:08  
121:21 - 122:02  
127:10 - 127:15  
127:17 - 127:17  
139:03 - 139:13  
141:03 - 141:05  
141:07 - 141:08  
160:08 - 162:03  
171:05 - 171:20  
173:01 - 173:02  
173:04 - 173:18  
204:18 - 204:20  
205:01 - 205:19

2. Dynamic Security's 30(b)(6) Deponent (Sherry Spires)<sup>2</sup>

008:16 - 008:18  
008:21 - 009:03  
012:15 - 012:23  
014:21 - 016:03  
016:21 - 016:22  
017:11 - 018:05  
018:07 - 018:18  
018:21 - 018:21

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<sup>2</sup> A copy of the proposed deposition excerpts is attached as Exhibit B

019:08 - 019:20  
020:19 - 020:22  
021:04 - 021:14  
021:17 - 022:05  
022:17 - 023:12  
024:03 - 025:04  
025:06 - 025:16  
025:20 - 026:08  
035:01 - 035:09  
035:18 - 035:19  
035:23 - 037:09  
037:11 - 037:13  
038:02 - 038:07  
038:11 - 038:17  
038:20 - 039:01  
039:07 - 039:16  
039:23 - 040:17  
043:06 - 044:14

3. Hyundai Motor Manufacturing's 30(b)(6) Deponent (Robert Burns)<sup>3</sup>

009:08 - 010:01  
010:07 - 011:09  
012:12 - 013:09  
015:23 - 016:04  
016:10 - 016:15  
017:06 - 017:11  
025:09 - 025:12  
028:22 - 029:05  
029:15 - 029:23  
037:06 - 037:09

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<sup>3</sup> A copy of the proposed deposition excerpts is attached as Exhibit C

040:21 - 042:21  
043:12 - 045:07  
045:12 - 046:11  
046:16 - 047:01  
048:07 - 049:19  
053:06 - 055:08  
055:14 - 055:17  
057:17 - 058:08  
062:01 - 064:02  
066:19 - 067:02  
068:09 - 069:15  
081:19 - 082:11  
083:08 - 084:12  
085:07 - 085:14  
086:12 - 088:06  
089:02 - 089:04  
090:20 - 091:18  
092:04 - 092:16  
092:20 - 093:20  
094:02 - 095:01  
095:08 - 095:12  
095:16 - 096:02  
096:05 - 096:14  
096:18 - 097:10  
098:04 - 099:04  
099:06 - 099:16  
099:19 - 100:20  
105:20 - 106:22  
107:13 - 107:15  
107:17 - 108:04  
112:22 - 113:05  
116:22 - 117:01  
117:10 - 118:02  
118:22 - 119:13  
119:17 - 119:19  
127:17 - 128:02

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

128:05 - 128:17  
130:23 - 132:21  
139:08 - 139:15  
140:04 - 140:07  
141:15 - 141:23  
144:01 - 144:04  
144:16 - 145:08  
154:04 - 154:12  
155:12 - 156:17  
156:20 - 157:05  
158:16 - 158:18  
158:22 - 159:03  
159:09 - 159:17  
159:21 - 161:08  
163:10 - 163:19  
163:23 - 164:03  
164:20 - 168:05  
171:09 - 172:10  
174:03 - 176:04  
176:07 - 176:10  
182:23 - 183:18  
190:19 - 191:17  
191:20 - 193:19  
194:11 - 194:23  
196:07 - 199:13  
199:18 - 199:20  
201:18 - 202:06  
202:09 - 202:20  
205:12 - 208:09  
212:17 - 212:23  
215:04 - 216:04  
216:17 - 216:20  
220:01 - 221:01  
221:14 - 225:10  
227:10 - 227:14  
228:06 - 228:11

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM



235:21 - 236:17  
236:22 - 237:03  
239:21 - 240:02  
240:23 - 241:17  
242:02 - 242:03  
245:12 - 245:17  
246:07 - 246:18  
247:01 - 247:06  
248:01 - 248:10  
248:14 - 249:07  
249:11 - 249:11  
250:04 - 250:17  
250:23 - 253:07  
253:13 - 253:21  
260:04 - 260:17  
261:11 - 262:05  
262:11 - 264:11  
264:14 - 264:20  
264:23 - 265:06  
265:09 - 265:12  
265:15 - 265:15  
265:18 - 266:03  
266:06 - 267:21  
267:23 - 268:09  
269:07 - 269:12  
285:05 - 285:13  
297:11 - 297:22  
299:08 - 301:04

4. Hyundai Eng America's 30(b)(6) deponent (Cassandra Williams)<sup>4</sup>

007:19 - 007:21  
008:03 - 008:05

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<sup>4</sup> A copy of the proposed deposition excerpts is attached as Exhibit D

014:06 - 014:23  
015:01 - 015:16  
015:20 - 015:20  
016:17 - 016:23  
017:01 - 017:23  
018:01 - 018:07  
018:13 - 018:23  
019:01 - 019:20  
020:13 - 020:23  
021:01 - 021:06  
021:13 - 021:23  
022:01 - 022:22  
023:18 - 023:20  
024:02 - 024:04  
024:06 - 024:10  
024:12 - 024:15  
029:06 - 029:20  
031:04 - 031:12  
031:16 - 031:23  
032:01 - 032:16  
032:18 - 032:23  
033:01 - 033:05  
033:08 - 033:23  
034:01 - 034:10  
034:13 - 034:22  
035:01 - 035:03  
035:05 - 035:10  
035:13 - 035:13  
035:18 - 035:23  
036:01 - 036:02  
036:04 - 036:06  
036:09 - 036:23  
037:01 - 037:05  
037:07 - 037:12  
037:15 - 037:15  
038:01 - 038:23

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Plaintiff's Witness List  
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039:01 - 039:22  
040:03 - 040:21  
041:01 - 041:06  
041:20 - 041:23  
042:01 - 042:22  
043:01 - 043:08  
044:03 - 044:05  
044:07 - 044:14  
044:18 - 044:18  
045:05 - 045:16  
045:19 - 045:23  
046:04 - 046:04  
046:17 - 046:23  
047:01 - 047:23  
048:01 - 048:04  
048:07 - 048:16  
048:18 - 048:18  
049:08 - 049:12  
049:14 - 049:17  
049:19 - 049:23  
050:01 - 050:02  
050:06 - 050:18  
052:01 - 052:03  
052:05 - 052:07  
052:09 - 052:15  
052:18 - 052:22  
053:06 - 053:23  
054:01 - 054:01  
054:17 - 054:23  
055:01 - 055:12  
055:15 - 055:19  
055:22 - 055:23  
056:01 - 056:03  
056:06 - 056:09  
056:11 - 056:17  
057:03 - 057:23

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

058:01 - 058:09  
058:11 - 058:18  
058:20 - 058:23  
059:14 - 059:18  
060:02 - 060:14  
061:14 - 061:21  
061:23 - 061:23  
062:01 - 062:06  
062:08 - 062:10  
062:12 - 062:23  
063:01 - 063:04  
063:13 - 063:23  
064:02 - 064:23  
065:01 - 065:20  
066:01 - 066:06  
066:09 - 066:11  
066:13 - 066:16  
066:19 - 066:23  
067:01 - 067:13  
067:15 - 067:15  
068:07 - 068:19  
068:21 - 068:23  
069:01 - 069:01  
069:07 - 069:14  
069:17 - 069:18  
069:20 - 069:23  
070:01 - 070:10  
070:12 - 070:15  
070:19 - 070:19  
072:03 - 072:16  
072:19 - 072:20  
073:21 - 073:23  
074:01 - 074:02  
075:06 - 075:23  
076:01 - 076:03  
076:06 - 076:06

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
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076:20 - 076:21  
077:01 - 077:01  
077:07 - 077:12  
077:14 - 077:19  
077:22 - 077:23  
078:01 - 078:23  
079:01 - 079:20  
080:07 - 080:10  
080:12 - 080:12  
080:14 - 080:14  
080:16 - 080:23  
081:01 - 081:08  
081:18 - 081:23  
082:01 - 082:06  
082:11 - 082:12  
082:19 - 082:20  
082:23 - 082:23  
083:01 - 083:04  
083:07 - 083:10  
083:16 - 083:20  
083:23 - 083:23  
084:01 - 084:09  
084:20 - 084:23  
085:14 - 085:16  
087:02 - 087:07  
087:10 - 087:10  
087:19 - 087:23  
088:01 - 088:23  
089:02 - 089:15  
092:19 - 092:23  
093:02 - 093:13  
093:15 - 093:22  
094:02 - 094:23  
095:03 - 095:23  
096:01 - 096:10  
096:14 - 096:22

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

099:06 - 099:14  
099:17 - 099:23  
100:01 - 100:03  
100:10 - 100:18  
100:21 - 100:21  
101:01 - 101:16  
102:01 - 102:23  
103:01 - 103:23  
104:01 - 104:23  
105:01 - 105:02  
105:09 - 105:11  
105:13 - 105:20  
105:22 - 105:22  
106:11 - 106:13  
106:16 - 106:23  
107:01 - 107:23  
108:07 - 108:11  
108:13 - 108:14  
108:19 - 108:23  
109:01 - 109:02  
109:04 - 109:09  
109:11 - 109:11  
111:02 - 111:05  
111:08 - 111:12  
111:14 - 111:23  
112:06 - 112:10  
112:13 - 112:17  
117:18 - 117:21  
118:04 - 118:06  
118:09 - 118:17  
118:19 - 118:23  
119:03 - 119:08  
119:10 - 119:10  
135:16 - 135:18  
151:17 - 151:18  
151:22 - 151:23

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

152:01 - 152:03  
152:07 - 152:07  
152:16 - 152:19  
152:23 - 152:23  
153:01 - 153:23  
154:01 - 154:04  
155:08 - 155:18  
155:20 - 155:22  
156:01 - 156:02

D. Plaintiff May Present the Following Witnesses Via Deposition:

1. Ray Cureton<sup>5</sup>

008:21 - 008:23  
009:18 - 009:21  
014:19 - 015:15  
015:18 - 015:19  
016:09 - 016:23  
017:07 - 017:12  
017:16 - 017:18  
020:22 - 021:19  
021:22 - 022:19  
022:23 - 024:03  
025:18 - 025:19  
025:22 - 026:09  
030:02 - 030:09  
030:11 - 031:04

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<sup>5</sup> Mr. Cureton was deposed in 2022. At that time, he lived in Prattville, Alabama. Out of an abundance of caution, portions of his deposition are being designated to use at trial if he is unavailable to testify, the Plaintiff is unable to perfect service of a trial subpoena on him, and/or other circumstances preclude him from appearing to give testimony at trial. A copy of the excerpts of his deposition testimony which Plaintiff plans on using is attached as Exhibit E. Mr. Cureton's deposition was videotaped. If his deposition is presented in lieu of live testimony, Plaintiff intends to present the video clips of the portions designated.

031:07 - 031:14  
034:03 - 034:21  
036:14 - 038:05  
045:18 - 045:19  
046:18 - 047:06  
047:08 - 047:16  
051:20 - 053:03  
054:02 - 054:03  
054:05 - 055:13  
055:19 - 058:19  
058:21 - 058:21  
059:01 - 059:22  
060:15 - 061:08  
061:10 - 062:09  
062:12 - 062:16  
062:21 - 063:22  
064:02 - 064:09  
064:11 - 065:09  
065:14 - 068:02  
069:09 - 069:10  
069:16 - 069:18  
069:20 - 069:20  
071:22 - 072:09  
072:13 - 072:15  
072:19 - 073:04  
073:08 - 073:08  
073:19 - 074:01  
075:04 - 075:06  
075:08 - 075:09  
075:13 - 075:17  
075:21 - 076:02  
076:04 - 076:04  
076:06 - 076:19  
076:21 - 078:03  
078:07 - 079:08  
079:20 - 079:22

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Plaintiff's Witness List  
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United States District Court for the Middle District of Alabama  
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080:03 - 080:14  
080:18 - 082:03  
082:05 - 082:18  
084:14 - 084:22  
085:03 - 085:21  
089:23 - 090:01  
090:03 - 090:06  
090:08 - 090:09  
090:12 - 090:20  
091:01 - 091:18  
091:21 - 092:03  
093:16 - 093:19  
094:06 - 094:19  
096:12 - 097:13  
097:18 - 098:06  
098:08 - 099:03  
101:08 - 101:22  
103:03 - 103:16  
104:04 - 104:09  
104:13 - 104:22  
107:16 - 107:22  
108:03 - 108:13  
108:16 - 108:17  
108:20 - 108:23  
109:22 - 110:09  
112:10 - 114:02  
114:19 - 115:23  
116:22 - 117:14  
117:16 - 117:16  
119:04 - 119:05  
119:10 - 119:21  
121:10 - 122:16  
122:23 - 123:07  
123:09 - 123:16  
123:20 - 124:04  
124:14 - 125:08

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

125:22 - 127:01  
 127:03 - 127:09  
 158:07 - 158:16  
 158:19 - 159:07  
 159:10 - 159:12  
 159:16 - 159:16

|  |                              |
|--|------------------------------|
|  | Respectfully submitted,      |
|  |                              |
|  | Attorneys for Plaintiff      |
|  | <i>/s/ Heather Leonard</i>   |
|  | Heather Newsom Leonard       |
|  | ASB-1152-061H                |
| OF COUNSEL:  |                              |
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| <a href="mailto:heather@heatherleonardpc.com">heather@heatherleonardpc.com</a>     |                              |
|  |                              |
|  | <i>/s/ Leslie A. Palmer.</i> |
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| OF COUNSEL:  |                              |
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| Birmingham, AL 35233   |                              |
| (205) 285-3050   |                              |
| <a href="mailto:leslie@palmerlegalservices.com">leslie@palmerlegalservices.com</a> |                              |

### **Certificate of Service**

I hereby certify that I have filed the foregoing on the Court's CM/ECF electronic filing system which will provide notice to all counsel of record on this 26th day of January 2023.

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Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
 United States District Court for the Middle District of Alabama  
 Civil Action 2:19-CV-767-ECM

Wesley C. Redmond  
Susan W. Bullock  
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[sbullock@fordharrison.com](mailto:sbullock@fordharrison.com)  
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Whitney R. Brown  
Lehr Middlebrooks Vreeland & Thompson, P.C.  
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[wbrown@lehrmiddlebrooks.com](mailto:wbrown@lehrmiddlebrooks.com)  
Phone: (205) 326-3002  
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[mmiller@bradley.com](mailto:mmiller@bradley.com)  
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[svaughan@bradley.com](mailto:svaughan@bradley.com)  
Phone: (205) 521-8000  
Counsel for Hyundai ENG America, Inc.

/s/ Leslie A. Palmer  
OF COUNSEL

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Plaintiff's Witness List  
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United States District Court for the Middle District of Alabama  
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